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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA, SOUTHERN DIVISION

ALLSTATE INSURANCE COMPANY, ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY and ALLSTATE INDEMNITY COMPANY, Plaintiffs, v. OBTEEN N. NASSIRI, D.C., individually, JENNIFER NASSIRI, individually, JIM ANDERSEN, individually, CHRISTYN ANDERSEN, individually, DAA TRUST, a Nevada Trust, HARLEY TRUCK, LLC, a Nevada limited liability company, 181 RUSTY PLANK, LLC, a Nevada limited liability company, ANDERSEN FAMILY TRUST, a Nevada trust, ADROON, LLC, a Nevada limited liability company, 2111 S. MARYLAND, LLC, and Nevada limited liability company, FAA FOI TUITAMA, individually, ADVANCED MED LLC, a	Case No. 2:15-cv-1434-GMN-VCF **PLAINTIFFS' SECOND AMENDED COMPLAINT**

California limited liability company, GREEN TREE SERVICES, LLC, dba MTC WEST COAST MEDICAL TRAINING CENTERS, a Nevada limited-liability company, VALLEY WELLNESS AND RECOVERY, an entity of unknown origin, and, GOOD HANDS CHIROPRACTIC, INC. dba GOOD HANDS CHIROPRACTIC, a Nevada corporation,

Defendants.

PLAINTIFFS' SECOND AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs ALLSTATE INSURANCE COMPANY, ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY and ALLSTATE INDEMNITY COMPANY, by and through their attorneys of record of the law firm McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP, and FAIN ANDERSON, LLP, hereby submit the following Second Amended Complaint against Defendants OBTEEN N. NASSIRI, D.C., JENNIFER NASSIRI, JIM ANDERSEN, CHRISTYN ANDERSEN, DAA TRUST, HARLEY TRUCK, LLC, 181 RUSTY PLANK, LLC, ANDERSEN FAMILY TRUST, ADROON, LLC, and 2111 S. MARYLAND, LLC, FAA FOI TUITAMA, ADVANCED MED LLC, GREEN TREE SERVICES LLC, dba MTC WEST COAST MEDICAL TRAINING CENTERS, VALLEY WELLNESS AND RECOVERY, GOOD HANDS CHIROPRACTIC, INC. dba GOOD HANDS CHIROPRACTIC as more fully set forth below.

DEMAND FOR A JURY TRIAL

1. Plaintiffs hereby demand a trial by jury on all issues, counts, claims and allegations contained within this Complaint or to be pleaded in the future, if necessary.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) because of diversity of citizenship. Plaintiffs are citizens and residents of the State of Illinois (see paragraphs 4-5 below). Defendants are citizens, residents and have their principal place of business in the State of Nevada. The amount in controversy exceeds $75,000 exclusive of interest and costs.

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3. A substantial part of the events and omissions giving rise to the claims stated herein occurred in this District (within the city of Las Vegas, in the state of Nevada) and at least one defendant is found in this District. Venue is proper in this District and this Division pursuant to 28 U.S.C. §§1391(b)(2) and (3) and pursuant to 18 U.S.C. §1965(b).

PARTIES TO THIS LITIGATION

4. Plaintiff, Allstate Insurance Company, is a corporation incorporated under the laws of the state of Illinois, with its principal place of business in Illinois.

5. Plaintiff, Allstate Property & Casualty Insurance Company, is a corporation incorporated under the laws of the state of Illinois, with its principal place of business in Illinois.

6. Plaintiff, Allstate Indemnity Company, is a corporation incorporated under the laws of the state of Illinois, with its principal place of business in Illinois.

7. OBTEEN N. NASSIRI, D.C. is competent adult, a resident and citizen of Nevada and has been employed as and working as a doctor of chiropractic medicine within the state of Nevada since 2000.

8. JENNIFER NASSIRI is a competent adult and a resident of the state of Nevada. Plaintiffs believe that Jennifer Nassiri is the legal wife of Dr. Nassiri.

9. JIM ANDERSEN is a competent adult and a resident of the state of Nevada. Mr. Andersen is believed to be the father of Jennifer Nassiri.

10. CHRISTYN ANDERSEN is a competent adult and a resident of the state of Nevada. Mrs. Andersen is believed to be the mother of Jennifer Nassiri.

11. FAA FOI TUITAMA is a competent adult and a resident of the state of Nevada. Mr. Tuitama is believed to be a friend and business associate of Obteen Nassiri.

12. DAA TRUST is a trust organized in and under the laws of the State of Nevada.

13. HARLEY TRUCK, LLC is a business entity organized in and under the laws of the State of Nevada.

14. 181 RUSTY PLANK, LLC is a business entity organized in and under the laws of the State of Nevada.

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15. ANDERSON FAMILY TRUST is a trust organized in and under the laws of the State of Nevada.

16. ADROON, LLC is a business entity organized in and under the laws of the State of Nevada.

17. 2111 S. MARYLAND, LLC is a business entity organized in and under the laws of the State of Nevada.

18. ADVANCED MED LLC is believed to be a California and/or Nevada limited liability company owned and controlled by Obteen Nassiri and used as a conduit to conceal money from Mr. Nassiri's creditors. It is also believed that Advanced Med is affiliated with businesses in Nevada and does business in the states of California and Nevada.

19. GREEN TREE SERVICES LLC, dba MTC WEST COAST MEDICAL TRAINING CENTERS and dba ADVANCED MED LLC, is a limited liability company formed in Nevada and is believed to be a successor entity to the business interests of Advanced Med LLC. This entity is believed to be owned and/or controlled by Obteen Nassiri and does business in Nevada and California.

20. VALLEY WELLNESS AND RECOVERY is an entity of unknown origin. This entity is believed to be owned and controlled by Obteen Nassiri and does business in Nevada.

21. GOOD HANDS CHIROPRACTIC, INC. dba GOOD HANDS CHIROPRACTIC is a Nevada corporation. This company is believed to be owned and controlled by Obteen Nassiri and does business in Nevada.

FACTUAL ALLEGATIONS

22. On March 20, 2008, Allstate Insurance Company, Allstate Property and Casualty Company, and Allstate Indemnity Company filed case no. 2:08-CV-00369 in the United States District Court, District of Nevada, against Obteen Nassiri, Jennifer Nassiri, Albert Noorda, M.D., Advanced Accident Chiropractic Care, Digital Imaging Services aka Digital Imaging Services, LLC, J&O Holdings, LLC, and Maryland Medical Center, LLC ("Judgment Defendants") for, among other claims, violations of the Racketeering Influenced and Corrupt Organizations Act (18 USC § 1962),

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Nevada State RICO violations (NRS 207.400), fraud, conspiracy to defraud, unjust enrichment/constructive trust, and declaratory relief.

23. After a trial on the merits and based upon jury verdict finding for Plaintiffs, a judgment was entered in favor of Plaintiffs and against Judgment Defendants in case no. 2:08-CV-00369 with attorney's fees and costs in the total amount of $8,699,298.78.

24. Before and after the judgment in the underlying action, Defendants in this case engaged in a series of fraudulent transfers of property and a pattern of behavior which violates the Nevada Uniform Fraudulent Transfers Act enunciated in NRS 112.140, et. seq. which were designed to avoid payment of the above judgment by hindering Plaintiff's ability to ascertain the nature and extent and true owner of the Judgment Defendants' assets available to satisfy the judgment.

ALLEGATIONS AS TO GREEN TREE SERVICES, LLC

25. Upon information and belief, Obteen Nassiri started a business in early 2011 called Advanced Med, LLC in order to continue his work in the medical community following his loss of a chiropractic license.

26. In an attempt to conceal profits and income derived from Advanced Med, LLC, Obteen Nassiri effectuated a transfer of Advanced Med, LLC and all its profits, proceed and other assets to Green Tree Services, LLC.

27. On September 9, 2011, Green Tree Services, LLC filed incorporation documents with the Nevada Secretary of State. Although Green Tress Services, LLC filings listed H.P. Tuipelehake as its managing member, the listed address of 7345 S. Durango Boulevard # 107 Las Vegas, NV 89113, has been tied to various other businesses owned and/or operated and/or affiliated with Obteen Nassiri.

28. On October 28, 2012, Green Tree Services, LLC amended its filings to replace H.P. Tuipelehake with Defendant Foi Tuitama as managing member. The same South Durango Boulevard Nassiri-affiliated address was used.

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29. On June 20, 2013, Green Tree Services, LLC again amended its filings to add Joshua Johnston as a managing member. This time, the filing replaces the South Durango Boulevard address with a new one located at 8794 Cadence Crossing, Las Vegas, NV 89178.

30. On June 25, 2016, Green Tree Services, LLC amended its filings yet again, this time to remove Foi Tuitama as a managing member.

31. Green Tree Services, LLC later amended its filing to name Joshua Johnston as President, and reverts the company back to the Nassiri-affiliated address of 7345 S. Durango Boulevard # 107 LV, NV 89113.

32. Green Tree Services, LLC filed yet another amendment, this time to change the address again and list it as a post office box in Las Vegas, Nevada.

33. Upon information and belief, Green Tree Services, LLC repeatedly changed its official address in order to conceal its relationship to Obteen Nassiri.

34. Green Tree Services, LLC later changed the name of Advanced Med, LLC to West Coast Medical Training Center and Med Ed Labs. W-9 payment information for work billed by Green Tree Services, LLC identifies it as doing business as West Coast Medical Training Centers.

35. The related work which occurred in January 12, 2015, lists Green Tree Services, LLC d/b/a West Coast Medical Training Centers' address as 7345 S. Durango Boulevard # 107 Las Vegas , NV 89113. However, Secretary of State filings during this time period show Green Tree Services, LLC with an address of PO Box 26567, Las Vegas, NV 89126.

36. Upon information and belief, Green Tree Services, LLC d/b/a West Coast Medical Training Centers continued to send out invoices for payment of work performed listing 7345 S. Durango Boulevard # 107 Las Vegas , NV 89113 through at least June, 2015, and potentially longer.

37. On June 23, 2015, Green Tree Services, LLC also sent out invoices on behalf of Advanced Med for $13,830. Green Tree Services, LLC d/b/a Advanced Med lists its address as 7345 S. Durango Boulevard # 107 Las Vegas, NV 89113, even though its corporate filings provide a different address for the company altogether at that time.

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38. By December 11, 2014, Green Tree Services, LLC had disavowed the Nassiri-affiliated 7345 S. Durango Boulevard # 107 Las Vegas , NV 89113 address for a Post Office Box. Upon information and belief, Green Tree Services, LLC changed addresses to hide Obteen Nassiri's involvement and effectuate a transfer of profits, proceeds and other property and assets of Advanced Med and West Coast Medical Training Centers to Green Tree Services, LLC.

39. Upon information and belief, Green Tree Services, LLC's manager Joshua Johnston, has no background, education, training or experienced in any way related to the medical field in general or any of the work/services performed or invoiced by Green Tree Services, LLC d/b/a West Coast Medical Training Centers and Green Tree Services, LLC d/b/a Advanced Med.

40. Prior to becoming the managing member of Green Tree Services, LLC, Joshua Johnston employed by Obteen Nassiri's father-in-law Jim Anderson through Anderson's company RSI Builders.

41. Upon information and belief, Obteen Nassiri was generating revenue and income for services he provided under the Green Tree Services, LLC d/b/a Advanced Med and Green Tree Services, LLC d/b/a West Coast Medical Training Centers banners.

42. In March, 2014, a debtor's examination under oath was taken of Obteen Nassiri wherein he testified that he had no income and has not filed federal income tax returns since 2011. Nassiri testified that his only source of income was from his in-laws.

43. Despite claiming that Green Tree Services, LLC has not provided Obteen Nassiri with an income from 2011 to the present, Obteen Nassiri continues to enjoy the same standard of living and lifestyle that he maintained prior to the judgment against him for RICO violations in 2:08-CV-00369.

44. Advanced Med business associate and insider Andrew Daley testified that Obteen Nassiri combined and colluded with Joshua Johnston to fold Nassiri's business activities into and under the Green Tree Services, LLC umbrella so that income, proceeds, profits and other assets generated by Green Tree Services, LLC d/b/a Advanced Med and Green Tree Services, LLC d/b/a West Coast Medical Training Centers could not be tied to Obteen Nassiri.

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45. Upon information and belief, Green Tree Services, LLC began operating under the fictitious firm name Med Ed Labs on or about February, 2015.

46. On August 12, 2015, Green Tree Services, LLC through its managing member Joshua Johnston, filed incorporation documents with the Nevada Secretary of State to make Med Ed Labs a non-profit corporation. Upon information and belief, Green Tree Services, LLC placed Joshua Johnston as the President, Secretary, Treasurer and Director of Med Ed Labs on its corporate filings.

47. These corporate filings also identify Joshua Johnston's address, as well as Med Ed Labs' place of business, as 7345 S. Durango Boulevard # 107 Las Vegas , NV 89113. This is the same Nassiri-affiliated address that Green Tree Services, LLC attempted to conceal in amended Secretary of State filings.

48. Green Tree Services, LLC closed it fictitious name filing for Med Ed Labs in August, 2015.

49. Despite his affiliation and ownership as director and board member control of Advanced Med, Med Ed Labs and West Coast Medical Training Centers, Joshua Johnston identifies himself on social media and business networking websites as a construction project manager with no medical experience or affiliation whatsoever.

50. Andrew Daley, business associate and insider for Advanced Med explained that Nassiri intended to take Advanced Med to non-profit corporate status in order to obtain additional income/revenue.

51. Upon information and belief, Med Ed Labs is the successor of Advanced Med, and continues to provide the same type of medical services previously solicited by Obteen Nassiri for Green Tree Services, LLC d/b/a Advanced Med and Green Tree Services, LLC d/b/a West Coast Medical Training Centers.

ALLEGATIONS AS TO ADVANCED MED, LLC

52. Defendant Advanced Med, LLC was officially incorporated on November 15, 2011. Upon information and belief, Advanced Med, LLC was doing business and generating profits, proceeds and income prior to its incorporation.

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53. Defendant Foi Tuitama was listed as Advanced Med, LLC's first manager with an address of 7835 S. Rainbow Boulevard #15, Las Vegas, NV 89139. Upon information and belief, the listed address for Advanced Med, LLC was the actual office of a Nassiri colleague and confidant, Jodi Altman, DC.

54. Obteen Nassiri was not listed as a manager or director in any way of Advanced Med, LLC in any corporate filings.

55. On January, 16, 2013; Obteen Nassiri represented on social/business networking and media websites (i.e. LinkedIn) that he was President and CEO of Advanced Med, LLC.

56. On February 6, 2013, Obteen Nassiri was presenting himself as "Dr. Obteen Nassiri, CEO" of Advanced Med for a proposed contractual relationships between Advanced Med and Platinum Training, LLC.

57. In 2014, Advanced Med was soliciting business on social media websites, while using Obteen Nassiri's photograph. However, Nassiri denied that Advanced Med was operational or making money during this timeframe in his sworn testimony.

58. Upon information and belief, Advanced Med was utilizing promotional materials between 2013 and through 2014 discussing their business operations and touting the following: 1) Cafeteria that can accommodate 50-75 attendees; 2) Doctor's lounge with Wi-Fi access and "very modern and beautiful"; 3) Modern and beautiful bathrooms/locker room that has lockers for attendees; 4) Large and spacious pre-lab area equipped with protection clothing; 5) Spacious and wide open physician training/skills room; 6) Fully equipped with audio/visual tower for full computer hook up; 7) Room enough to accommodate 50-75 attendees; and 8) related and necessary business and medical equipment required for hosting large medical presentations.

59. Upon information and belief, Advanced Med did and does continue to deny the existence of this equipment and business operations for this time frame.

60. In November, 2014, Obteen Nassiri issued a contract for employment to Andrew Daley on behalf of Advanced Med for the annual salary of $59,000 per year.

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61. Obteen Nassiri was paying Daley's Salary out of an Advanced Med bank account from Chase National Bank between December, 2014 and February, 2016.

62. Advanced Med's business was to put on medical "labs" for various medical providers. Advanced Med's profit margin, according to Andrew Daley, was and/or is $5,000 per lab, with the company doing an average monthly income up to $10,000.

63. Upon information and belief, Advanced Med was attending medical conferences across the country for the purposes of drumming up new business. For example, Obteen Nassiri attended the National Association of Spine Surgeons in San Francisco, CA on behalf of Advanced Med in November, 2014.

64. In December, 2014, Advanced Med (through Andrew Daley and Obteen Nassiri) removed medical and business equipment from Advanced Med's San Diego, CA location and transported it via U-Haul to Las Vegas, Nevada to be concealed and kept by Obteen Nassiri's brother. The equipment identified by Andrew Daley in his deposition as having been transported to Nassiri's brother had never been previously identified or disclosed by Nassiri to Allstate.

65. On January 15, 2015, Obteen Nassiri entered into an equipment rental agreement for $3,000 on behalf of Advanced Med.

66. Upon information and belief on June 16, 2015, Advanced Med submitted an invoice for services performed by Obteen Nassiri in the amount of $22,930.00.

67. In June, 2015 Advanced Med was performing medical training presentations and listing Obteen Nassiri as the Advanced Med contact.

68. As of December 5, 2015, billing related to Advanced Med was directed to the attention of Obteen Nassiri as manager.

69. Upon information and belief, between 2011 and 2016, Obteen Nassiri was doing business and collecting revenue as Advanced Med, and although he was never identified as member or director in company filings, Nassiri signed contracts, paid Advanced Med employees, conducted business, sent invoices and collected income and revenue for Advanced Med under the titles of CEO, President and Manager.

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70. Upon information and belief, between 2011 to present day, Advanced Med has sent invoices for payment, received payment for services provided and intentionally concealed profits from Allstate.

71. Upon information and belief, between 2011 to present day, Advanced Med concealed the existence of business equipment and property from Allstate.

72. In March, 2014, a debtor's examination under oath was taken of Obteen Nassiri wherein he testified that he had no income and has not filed federal income tax returns since 2011. Nassiri testified that his only source of income was from his in-laws.

73. Upon information and belief, Advanced Med has not filed any federal tax returns identifying payments made to any employees or consultants of Advanced Med (either Obteen Nassiri or Andrew Daley).

74. Despite claiming that Advanced Med has not provided Obteen Nassiri with an income from 2011 to the present, Obteen Nassiri continues to enjoy the same standard of living and lifestyle that he maintained prior to the judgment against him for RICO violations in 2:08-CV-00369.

ALLEGATIONS AS TO FOI TUITAMA

75. Foi Tuitama became acquainted with Obteen Nassiri in 2005 through Nassiri's father-in-law Jim Anderson. He is also the cousin of Sal Tuipelehake, who was the first listed manager of Green Tree Services, LLC.

76. On or about October 28, 2012, Tuitama replaced Tuipelehake as the manager of Green Tree Services, LLC with a business address of : 7345 S. Durango Boulevard, #107 LV, NV 89113.

77. Tuitama prior to that, Tuitama was named the manager of Advanced Med, LLC in Secretary of State filings of November 15, 2011.

78. Tuitama provided sworn testimony that it was Obteen Nassiri's idea to form Advanced Med, LLC and have Tuitama be the face. Tuitama and Nassiri opened a bank account for Advanced Med at Chase National Bank. Tuitama believed that he was helping to open the bank account for Obteen Nassiri's use.

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79. Tuitama was a straw man for Obteen Nassiri, so that Nassiri could generate an income and revenue from his medical work with Advanced Med without Allstate's knowledge.

80. At the time Tuitama opened the Chase National Bank Account he was aware that there was a judgment against Nassiri. Tuitama was also aware of the judgment against Nassiri while operating Advanced Med, LLC.

81. Tuitama was the transferee of business profits and payment from Nassiri.

82. Tuitama did not review or receive accounting ledgers, budget sheets, banking records or any other financial information. Tuitama only signed Advanced Med documents that Obteen Nassiri provided to him and ordered him to sign.

COUNT ONE

(Violation of the UFTA as to Anderson & Nassiri Defendants)

83. Plaintiffs re-allege and by this reference incorporate herein each and every allegation contained in Paragraphs 1 through 82 above.

84. On or about September 7, 2004, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI owned real property located at or near 231 Royal Wood Court Las Vegas, Nevada. On or about September 7, 2004, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI transferred said real property to DAA Trust.

Plaintiffs are informed and believe that this conveyance was made with the intent to hinder, delay and defraud Plaintiffs because the conveyance was made while the Defendants transferring this property were engaged in the fraudulent activities which ultimately resulted in a judgment being entered against those Defendants, and during the pendency of that litigation.

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Plaintiffs are informed and believe that this conveyance was made without receiving a reasonably equivalent value in exchange for the transfer, and that the Defendants transferring this property were engaged or were about to engage in businesses and transactions for which their remaining assets were unreasonably small in relation to the businesses and transaction, and that the Defendants transferring this property intended to incur, or believed or reasonably should have believed that they would incur, debts beyond their ability to pay as they became due.

85. On or about September 6, 2007, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI owned real property located at or near 5098 River Glen Drive #207, Las Vegas, Nevada. On or about September 6, 2007, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI transferred said real property to DAA Trust. On or about October 11, 2007, DAA Trust transferred said real property to Harley Truck, LLC.

Plaintiffs are informed and believe that these conveyances were made with the intent to hinder, delay and defraud Plaintiffs because these conveyances were made while the Defendants transferring this property were engaged in the fraudulent activities which ultimately resulted in a judgment being entered against those Defendants, and during the pendency of that litigation.

Plaintiffs are informed and believe that these conveyances were made without receiving a reasonably equivalent value in exchange for the transfer, and that the Defendants transferring this property were engaged or were about to engage in businesses and transactions for which their remaining assets were unreasonably small in relation to the businesses and transaction, and that the Defendants transferring this property intended to incur, or believed or reasonably should have believed that they would incur, debts beyond their ability to pay as they became due.

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86. On or about September 6, 2007, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI owned real property located at or near 181 Rusty Plank Avenue Las Vegas, Nevada. On or about September 6, 2007, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI transferred said real property to DAA Trust. On or about October 11, 2007, DAA Trust transferred said real property to 181 Rusty Plank, LLC. On or about June 19, 2013, 181 Rusty Plank, LLC transferred said real property to Andersen Family Trust. On or about June 6, 2014, Anderson Family Trust transferred said real property to Adroon LLC.

Plaintiffs are informed and believe that these conveyances were made with the intent to hinder, delay and defraud Plaintiffs because these conveyances were made while the Defendants transferring this property were engaged in the fraudulent activities which ultimately resulted in a judgment being entered against those Defendants, and during the pendency of that litigation.

Plaintiffs are informed and believe that these conveyances were made without receiving a reasonably equivalent value in exchange for the transfer, and that the Defendants transferring this property were engaged or were about to engage in businesses and transactions for which their remaining assets were unreasonably small in relation to the businesses and transaction, and that the Defendants transferring this property intended to incur, or believed or reasonably should have believed that they would incur, debts beyond their ability to pay as they became due.

87. On or about August 26, 2005, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI owned real property located at or near 2111 S. Maryland Parkway, Las Vegas, Nevada. On or about August 26, 2005, Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI transferred said real property to 2111 S. Maryland Parkway, LLC. On or about June 3, 2011, 2111 S. Maryland Parkway, LLC transferred said real property to DAA Trust. On or about February 24, 2012, DAA Trust transferred said real property to Harley Truck, LLC.

Plaintiffs are informed and believe that these conveyances were made with the intent to hinder, delay and defraud Plaintiffs because these conveyances were made while the Defendants transferring this property were engaged in the fraudulent activities which ultimately resulted in a judgment being entered against those Defendants, and during the pendency of that litigation.

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Plaintiffs are informed and believe that these conveyances were made without receiving a reasonably equivalent value in exchange for the transfer, and that the Defendants transferring this property were engaged or were about to engage in businesses and transactions for which their remaining assets were unreasonably small in relation to the businesses and transaction, and that the Defendants transferring this property intended to incur, or believed or reasonably should have believed that they would incur, debts beyond their ability to pay as they became due.

88. Additionally, individuals and company Defendants named in this case have worked in concert with Obteen Nassiri to conceal income and assets owned by Mr. Nassiri, thereby, assisting in transfers of assets to assist Mr. Nassiri in his course of conduct with the intent to hinder, delay and defraud Plaintiffs and otherwise prohibit Plaintiffs from their collections efforts in satisfying their judgement in the above-referenced litigation.

89. The transfers and/or allocations of property referenced above were fraudulent conveyances as defined in NRS 112.180. Plaintiffs are entitled to relief for the fraudulent transfers and/or allocations made by Defendants pursuant to NRS 112.210, NRS 112.220, and any other applicable section of NRS 112.140, et. seq.

COUNT TWO

(Violation of the UFTA for Actual and Constructive Fraud as to Green Tree Services, LLC)

90. Plaintiffs re-allege and by this reference incorporate herein each and every allegation contained in Paragraphs 1 through 89 above.

91. Obteen Nassiri generated and obtained profits, proceeds, income and other personal property through his continued work in the medical field under Green Tree Services, LLC d/b/a Advanced Med and Green Tree Services, LLC d/b/a West Coast Medical Training Centers.

92. Obteen Nassiri transferred these profits, proceeds, income and other personal property to Green Tree Services, LLC d/b/a Advanced Med and Green Tree Services, LLC d/b/a West Coast Medical Training Centers.

93. Obteen Nassiri through Green Tree Services, LLC d/b/a Advanced Med transferred business and medical equipment from Advanced Med's California location to Las Vegas.

94. Obteen Nassiri did not disclose the existence of this business and medical equipment to Allstate.

95. Obteen Nassiri remains in control of the equipment and other personal property transferred to Green Tree Services, LLC.

96. In the alternative, Green Tree Services, LLC d/b/a Advanced Med remains in control of the business and medical equipment.

97. Obteen Nassiri and/or Green Tree Services, LLC d/b/a Advanced Med made the transfer with the actual intent to hinder, delay or defraud Allstate.

98. Green Tree Services, LLC is a transferee of the medical equipment, business equipment and other personal property Nassiri transferred from the Advanced Med California location to Las Vegas.

99. Obteen Nassiri also effectuated a transfer of all revenue, profits and other capital and income generated in the name of Advanced Med and West Coast Medical Training Centers to Green Tree Services, LLC.

100. Nassiri retained possession and control of this transferred property.

101. Obteen Nassiri continues to transfer revenue, profits and other capital and income generated from Advanced Med to Green Tree Services, LLC by way of Green Tree Services, LLC's manager Joshua Johnston.

102. Joshua Johnston and Green Tree Services, LLC are one in the same, and the alter ego of each other.

103. Obteen Nassiri remains in control of the transferred revenue, profits and other capital and income generated through the entity Advanced Med.

104. In the alternative, Green Tree Services, LLC through its manager Joshua Johnston, retains possession and control of this transferred property.

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105. Obteen Nassiri has maintained that he is and has been insolvent for the years and times he was generating revenue, profits and other capital and income under the names Advanced Med, West Coast Medical Training Centers and Med Ed Labs. He has maintained his claim of insolvency while these transfers were taking place.

106. Green Tree Services, LLC was and is the transferee of Obteen Nassiri's revenue, profits and other capital and income from 2011 through present.

107. Separately, and/or in the alternative, Green Tree Services, LLC was an insider relating to the transfer of profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license.

108. The profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license were essential assets.

109. Green Tree Services, LLC through its managers Foi Tuitama and Joshua Johnson, knew or had reason to know that Obteen Nassiri had a judgment for fraud and RICO violations from Allstate at the time of these transfers.

110. Green Tree Services, LLC has no background, education or training in the medical services provided by Advanced Med, Med Ed Labs or West Coast Medical Training Centers.

111. Green Tree Services, LLC through its managers Foi Tuitama and Joshua Johnson, knew or had reason to know that Obteen Nassiri was intending to hinder, delay and defraud Allstate in the collection of its judgment by setting up Advanced Med and West Coast Medical Training Centers and redacting any mention of Obteen Nassiri from the corporate documents.

112. Separately, and/or in the alternative, Obteen Nassiri did not receive any compensation or reasonably equivalent value for the medical and business equipment and property he transferred to Green Tree Services, LLC from Advanced Med's California location to Las Vegas.

113. Additionally, Obteen Nassiri believed or reasonably should have believed and known that making these transfers to Green Tree Services, LLC would cause him to be unable to pay his debts relating to the judgment obtained Allstate.

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COUNT THREE

(Violation of the UFTA for Actual and Constructive Fraud as to Advanced Med, LLC)

114. Plaintiffs re-allege and by this reference incorporate herein each and every allegation contained in Paragraphs 1 through 113 above.

115. Obteen Nassiri generated and obtained profits, proceeds, income and other personal property through his continued work in the medical field under Advanced Med, LLC.

116. Advanced Med, LLC was a corporate entity formed to distance Obteen Nassiri's income from under its prior banner of Green Tree Services, LLC d/b/a Advanced Med.

117. Advanced Med, LLC was the transferee of all Obteen Nassiri's obtained profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license.

118. The transfer of Obteen Nassiri's obtained profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license occurred before, during and after the judgment against him for Fraud and RICO violations.

119. Advanced Med, LLC was an insider relating to the transfer of profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license.

120. Separately, and/or in the alternative, Obteen Nassiri's retained and continues to retain possession or control of profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license that were transferred to Advanced Med, LLC.

121. While conducting these transfers, Obteen Nassiri has maintained that he is insolvent and has no income or assets.

122. The profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license were essential assets.

123. Obteen Nassiri made these transfers with the actual intent to hinder, delay and defraud Allstate from the collection of the judgment.

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124. Advanced Med, LLC knew of the judgment at the time it was the transferee.

125. Separately, and/or in the alternative, Obteen Nassiri did not receive equal value for the transfers, and knew or reasonably should have believed that making these transfers would prevent his ability to pay his debt relating to the judgment.

COUNT FOUR

(Violation of the UFTA for Actual and Constructive Fraud as to Foi Tuitama)

126. Plaintiffs re-allege and by this reference incorporate herein each and every allegation contained in Paragraphs 1 through 125 above.

127. Obteen Nassiri generated and obtained profits, proceeds, income and other personal property through his continued work in the medical field under Advanced Med, LLC.

128. Foi Tuitama assisted in setting up Advanced Med, LLC, and agreed to operate it as straw man.

129. Tuitama had knowledge of Obteen Nassiri's judgment at the time he set up bank accounts and was operating Advanced Med, LLC.

130. Tuitama was also a managing member of Green Tree Services, LLC.

131. Obteen Nassiri transferred profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license to Foi Tuitama.

132. Foi Tuitama was the transferee of all Obteen Nassiri's obtained profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license.

133. While conducting these transfers, Obteen Nassiri has maintained that he is insolvent and has no income or assets.

134. Separately, and/or in the alternative, Obteen Nassiri retained and continues to retain possession or control of profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license that were transferred to Advanced Med, LLC.

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135. Separately, and/or in the alternative, Foi Tuitama was an insider relating to the transfer of profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license.

136. Separately, and/or in the alternative, Obteen Nassiri did not receive equal value for the transfers, and knew or reasonably should have believed that making these transfers would prevent his ability to pay his debt relating to the judgment.

COUNT FOUR

(Civil Conspiracy as to Foi Tuitama and Green Tree Services, LLC)

137. Plaintiffs re-allege and by this reference incorporate herein each and every allegation contained in Paragraphs 1 through 136 above.

138. Foi Tuitama colluded with Obteen Nassiri to set up Advanced Med, LLC for the purposes of concealing from Allstate profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of Nassiri's chiropractic license.

139. Tuitama assisted in devising a plan whereby Obteen Nassiri would be able to continue to work in the medical field and obtain profits, income and other property without alerting Allstate to Nassiri's involvement.

140. Tuitama was aware of Nassiri's judgment for fraud and RICO at the time he set up bank accounts in Advanced Med, LLC's name.

141. Information necessary for filing of this civil conspiracy claim was obtained through the deposition of Foi Tuitama, which took place on February 27, 2015.

142. Tuitama further assisted Obteen Nassiri in concealing profits, proceeds, income and other personal property when he took over as the managing member of Green Tree Services, LLC.

143. Tuitama took over Green Tree Services, LLC to facilitate Green Tree Services, LLC's continued cooperation with the conspiracy.

144. Tuitama was already aware of Nassiri's debt and scheme to defraud Allstate by setting up Advanced Med, LLC when he took over as managing member of Green Tree Services, LLC.

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145. Tuitama intended to continue the collusion and scheme to conceal profits, proceeds, income and other personal property when he took over Green Tree Services, LLC from his cousin.

146. Tuitama's agreement to conspire with Nassiri began approximately November, 2011, and continued through February, 2015 when Tuitama finally disclosed the extent of his involvement in the conspiracy.

147. Tuitama maintained this collusion and conspiracy by doing the following, among others: 1) agreeing to set up Advanced Med, LLC; 2) knowing that Advanced Med, LLC was to be the business Obteen Nassiri used to hide income, profits and assets; 3) setting up a bank account of Advanced Med, LLC with Nassiri that he knew Nassiri would have sole control over; 4) repeatedly filing annual reports with the Nevada Secretary of State to maintain Advanced Med, LLC's corporate fiction; 5) agreeing to become managing member of Green Tree Services, LLC in order to assist them in maintaining their corporate fiction; 6) filing amendments with Nevada Secretary of State to hide the actual location of Green Tree Services, LLC that would demonstrate Nassiri's involvement; and failing to disclose the extent of his involvement in the conspiracy until 2015.

148. Through Tuitama's actions and assistance, Obteen Nassiri was able to conceal profits, proceeds, income and other personal property beginning in at least 2011 and up through February, 2016 and possibly later.

149. Green Tree Services, LLC conspired with Obteen Nassiri to conceal profits, proceeds, income and other personal property generated from his continued work in the medical field following the loss of his chiropractic license.

150. Green Tree Services, LLC, through its original managing member, H.P. Tuipelehake, agreed, conspired and/or colluded with Obteen Nassiri to create a corporate fiction that would allow Nassiri to keep generating income while at the same time shielding his activities from Allstate in its attempts to collect on a Fraud and RICO judgment.

151. H.P. Tuipelehake knew that Green Tree Services, LLC was intended to be operated by Obteen Nassiri, and him alone. Green Tree Services, LLC through H.P. Tuipelehake agreed to maintain the fiction of a separate corporate identity so that Nassiri was not identified.

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152. Green Tree Services, LLC maintained this collusion and conspiracy by doing the following, among others: 1) omitting Nassiri from any corporate filings; 2) repeatedly changing managing members once they were discovered to be straw men; 3) repeatedly filing amended corporate filings to represent that Nassiri was not involved with the business; 4) registering the fictitious firm names of Advanced Med, West Coast Medical Training Centers and Med Ed Labs; 5) changing corporate addresses in an attempt to demonstrate that Green Tree Services, LLC was under new ownership (i.e. Joshua Johnston); and 6) finding a corporate replacement for Tuitama among the employees of Nassiri's father-in-law (.i.e. Jim Anderson).

153. Green Tree Services, LLC continues to maintain this conspiracy by using its managing member Joshua Johnston to set up another corporate fiction in Med Ed Labs.

154. Johnston is the President, Secretary, Treasurer and Director of Med Ed Labs, even though he has no training, education or experience in the medical field and holds himself out simply as a construction project manager.

155. Upon information and belief, Johnston was placed in this position by Green Tree Services, LLC.

156. Through Green Tree Services, LLC's actions and assistance, Obteen Nassiri was able to conceal profits, proceeds, income and other personal property beginning in at least 2011 and up through February, 2016 and possibly later.

157. Plaintiffs are unable to allege additional specific facts as to Green Tree Services, LLC, because that information was in the sole possession of Green Tree Services, LLC. To date, Green Tree Services, LLC has refused or otherwise failed to produce or provide any viable information regarding these matters.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief as follows:

1. Avoidance of any fraudulent transfers to the extent necessary to satisfy the amount of Plaintiffs' judgment against Defendants OBTEEN N. NASSIRI and JENNIFER NASSIRI.

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2. Attachment and garnishment of any property fraudulently transferred, or any other property of the individual or entity that the property was fraudulently transferred to in accordance with NRS 112.210;

3. An injunction against further disposition of any fraudulent transfers in accordance with NRS 112.210;

4. A judgment against Defendant transferees for the amount of any fraudulent transfer received in accordance with NRS 112.220;

5. Punitive damages against Defendants Foi Tuitama and Green Tree Services, LLC

6. Any other relief the circumstances may require.

7. Attorney's fees and all costs, including expert expenses, incurred by Plaintiffs as a result of Defendants' conduct as permitted by both Federal and Nevada state law both before and after the filing of this Complaint;

8. That Plaintiffs be awarded such other and further relief as the Court deem just and proper.

Dated this 1st day of March, 2017

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By //s// Jared P. Green

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2017, a true and correct copy of **PLAINTIFFS' SECOND AMENDED COMPLAINT** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

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By *//s// Kristin Thomas*
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